

Appl. No. 10/002,869
Amdt. dated August 4, 2004.
Reply to Office Action of May 6, 2004

REMARKS

Claims 1 to 20 were pending in the application at the time of examination. Claims 1, 3 to 15 and 17 to 20 stand rejected as obvious. Claims 2 and 16 stand objected to for being dependent on a rejected base claim, but would be allowable if rewritten in independent form including all the limitations of the base claim and any intervening claims.

Applicant has amended the description to correct grammatical errors.

Claims 1 and 6 to 15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the admitted prior art in view of U.S. Patent No. 6,240,482 B1, hereinafter Gates. The Examiner stated in part:

. . . Gates discloses a method for partitioning memory into sections depending on the type of information (Column 4, Lines 1-6; One section, i.e. a page since only one page can exist in a section, could be used for non-Packetized SCSI Protocol block storage and another section could be used for Packetized SCSI Protocol hardware I/O control block storage). . . .

Applicant respectfully traverses the obviousness rejection of Claim 1. First, Applicant respectfully submits that the Examiner has both mischaracterized Gates and contradicted the explicit teachings of Gates with respect to the definitions of pages and the number of pages in a section.

The Examiner stated, as quoted above, "only one page can exist in a section." However, Gates taught:

an external memory section contains transfer control blocks where each transfer control block (TCB) corresponds to a page in the section.

Gates, Col. 3, lines 62 to 65.

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Thus, Gates explicitly defines that a transfer control block corresponds to a page. A transfer control block is a hardware I/O control block and so based upon the teaching of Gates, a hardware I/O control block corresponds to a page. Therefore, according to Gates, a transfer control block and not a memory section as stated by the Examiner define a page.

Gates further taught:

. . . the remainder of memory 142 contains a TCB section for transfer control blocks and scatter/gather lists. . .
. In the exemplary embodiment, the TCB section is partitioned into 256-byte areas where each area contains a 128-byte TCB page and a 128-byte SIG list. (Emphasis added.)

Gates, Col. 9, lines 24 to 30.

Here, Gates defines a section, "a TCB section" and further defines that the section includes 256 areas that each in turn include a TCB page. Thus, contrary to the Examiner's statement, Gates explicitly taught that a section of memory includes multiple TCB pages, and not "only one page can exist in a section."

The MPEP directs:

FACT THAT REFERENCES CAN BE COMBINED OR MODIFIED IS NOT SUFFICIENT TO ESTABLISH *PRIMA FACIE* OBVIOUSNESS (Emphasis in original)

MPEP § 2143.01, 8 Ed., Rev. 2, pg. 2100-131 (May 2004).

The basis for the current rejection requires a modification to the explicit definitions and teachings of Gates. The Examiner has cited no basis for such modifications and instead makes incorrect conclusory statements without any citation to the prior art. Further, the Examiner has cited no teaching or suggestion in Gates of the two specific SCSI

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protocols recited in Claim 1, or of any hardware I/O control blocks associated with such protocols. Accordingly, based upon the MPEP, the Examiner has failed to establish a basis for a prima facie obviousness rejection. Applicant respectfully requests reconsideration and withdrawal of the obviousness rejection of Claim 1.

Claims 6 to 9 depend from Claim 1 and so distinguish over the cited prior art for at least the same reasons as Claim 1. Applicant respectfully requests reconsideration and withdrawal of the obviousness rejection of each of Claims 6 to 9.

Claim 10 was rejected as obvious using the same characterization of Gates as quoted above for Claim 1. The above comments with respect to Gates and the teaching of TCB pages and the TCB section of memory are incorporated herein by reference. Further, Claim 10 recites in part:

a hardware I/O control block array comprising:
a plurality of pages including a first page and
a second page,
wherein said first page includes a
plurality of hardware I/O control block storage
sites equal to a number of unique tag values
that can be returned by a non-Packetized SCSI
Protocol tagged queue target reconnecting to
said parallel SCSI host adapter; and
said second page includes another plurality
of hardware I/O control block storage sites.

Gates uses "a TCB memory section" and a plurality of TCB pages in that section. First, the definitions used by Gates are different from the definitions used by Applicant. In Gates a transfer control block is a TCB page and so is not divisible.

In contrast, the page, as recited in Claim 10, includes a plurality of hardware I/O control block storage sites. At most based upon Gates, the suggestion is to use a single memory section as an array to hold all the transfer control blocks. The Examiner has failed to cite any teaching in Gates of multiple memory sections that hold transfer control blocks.

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Accordingly, by using a single memory section to hold all the transfer control blocks, Gates teaches away from Applicant's invention as recited in Claim 10. Applicant requests reconsideration and withdrawal of the obviousness rejection of Claim 10.

Claims 11 to 15 depend from Claim 10 and so distinguish over the cited prior art for at least the same reasons as Claim 10. Applicant respectfully requests reconsideration and withdrawal of the obviousness rejection of each of Claims 11 to 15.

Claims 3 to 5, 17 to 19, and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the admitted prior art, in view of Gates, and further in view of U.S. Patent No. 6,651,136 B2, hereinafter referred to as "Percival."

Applicant respectfully traverses the rejection of Claims 3 to 5 and 17 to 19. Assuming the combination of references is correct, the additional information cited by the Examiner in Percival fails to overcome the deficiency of the Gates as noted above with respect to Claims 1 and 10. Accordingly since Claims 3 to 5 depend from Claim 1, Claims 3 to 5 distinguish over this combination for at least the same reasons as Claim 1. Since Claims 17 to 19 depend from Claim 10, Claims 17 to 19 distinguish over this combination for at least the same reasons as Claim 10. Applicant respectfully requests reconsideration and withdrawal of the obviousness rejection of each of Claims 3 to 5 and 17 to 19.

Claim 20 includes limitations equivalent to those in Claim 1. Accordingly, the above comments with respect to Claim 1 are applicable to Claim 20 and are incorporated herein by reference. Assuming the combination of references is correct, the additional information cited by the Examiner in Percival fails to overcome the deficiency of Gates as noted above with respect to Claim 1. Applicant respectfully requests

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reconsideration and withdrawal of the anticipation rejection of Claim 20.

Claims 2 and 16 stand objected to for being dependent on a rejected base claim, but would be allowable if rewritten in independent form including all the limitations of the base claim and any intervening claims. In view of the above remarks with respect to Claims 1 and 10, Applicant has not amended Claims 2 and 16 at this time.

Claims 1 to 20 remain in the application. For the foregoing reasons, Applicant(s) respectfully request allowance of all pending claims. If the Examiner has any questions relating to the above, the Examiner is respectfully requested to telephone the undersigned Attorney for Applicant(s).

CERTIFICATE OF TRANSMISSION

I hereby certify that this correspondence is being facsimile transmitted to the U.S. Patent and Trademark Office, Fax No. (703) 872-9306, on the date shown below.


Jan O'Dell

August 4, 2004
Date of Signature

Respectfully submitted,



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